

Tuesday 7 June 2022

**South and West Plans Panel, Thursday 9 June 2022, planning application 21/07156/RM (Item 8)**

Dear Plans Panel Member

At the South and West Plans Panel meeting on Thursday, you will be considering Agenda Item 8, planning application 21/07156/RM, the reserved matters application for the erection of 289 dwellings with access within the site, garaging, parking, landscaping and public open space. In April 2022, the application was deferred subject to further information being submitted by the Applicant, Redrow. The proposal is located in the village of West Ardsley, south-west of Leeds.

If allowed, the West Ardsley Action Group (WAAG) would like to address the meeting on behalf of fellow residents.

Although site notices appeared on 18 May 2022, documents outlining the changes you will be considering were not publicly available on the Leeds City Council (LCC) website until the following week. Furthermore, since the Chief Planning Officer's report was published on 30 May 2022, this has not given sufficient time for WAAG or residents to make representations which can be reflected in his report.

The key aspects at this stage of the planning process are layout, access (other than approved under 17/08262/OT), scale, appearance and the landscaping of the site; matters which resonate with many of the issues raised by Members. This will set how the development will look and is in many ways the most important stage of the whole planning process.

The points of resolution listed in the Chief Planning Officer's report are from the South and West Plans Panel meeting (April 2022) but an incorrect date has been cited (25 November 2021). This has led to a resident being refused the chance to speak at the Plans Panel. The only Plans Panel meeting on that date was the City Plans Panel and, having checked the Agenda, the application was not discussed.

Given the above, the purpose of this letter is to address the resolution requirements in light of the new information submitted by Redrow. We have provided our conclusions below with detailed comments in Annex 1.

- **Point 1 - Consideration of the provision of four and five bedroom homes for affordable housing:** Approximately 65% of the housing stock will be detached homes, however, no 3+bedroom detached dwellings will be affordable. We do not agree with the Applicant that the affordable homes are well integrated into the proposals.
- **Point 2 - Consideration of the provision of bungalows:** Only 4no. bungalows are provided consisting of 2no. detached and 2no. semi detached in Parcel A. This is less than 2% of proposed dwellings. Further consideration should be given for more bungalows, particularly on the sensitive site edges of the site in other land Parcels due to adjacent residential properties.
- **Point 3 - Further information on trees including a full tree survey to include the quality of trees and detail regarding carbon capture:** An Arboricultural Survey report needs to be provided by the Applicant in accordance with BS 5837:2012. Further information is required regarding the number and quality of trees and hedgerows which will be retained or removed. No tree survey has been provided by LCC Tree Officers in the interim period as raised by Members. Nor has information been provided which sets out what will be planted as replacement numbers for the loss of trees etc. and the estimated carbon capture enhancement.

- **Point 4 - Further information on compliance with street design guidance:** No information has been provided by the Applicant as to how the design conforms with the Street Design Guide Supplementary Planning Document (SPD) (August 2009). Nor have the LCC Design or Highways teams provided any new feedback on the proposals in light of the requests from the Panel. WAAG is convinced that Redrow's proposals do conflict with the Street Design Guide.
- **Point 5 - More detail on placemaking:** The information provided by the Applicant does not convey the essential local distinctiveness of the site and wider area. A key part of good placemaking entails involving the local community.
- **Point 6 - More clarity on cycle segregation and the footpath network:** There is a lack of connectivity between individual land Parcels and the surrounding area which limits sustainable travel options. Improvements to public footpaths are minimal and no cycle routes have been provided.
- **Point 7 - Invitation of a policy officer to discuss Policy H4 and the housing mix:** The Applicant must provide evidence of an up to date analysis of local needs as required by condition 7 of the outline consent (17/08262/OT) and policy H4. Evidence has not been presented despite the Chief Planning Officer's assertion to the contrary. This reserved matters application is invalid if it does not accord with condition 7.
- **Point 8 - Further consultation with Ward Councillors:** We suggest that a Community Forum with Redrow, Local Councillors and residents should be formed as part of a design review to help solve the issues with the development which clearly exist.

We accept the principle of development which reflects the need for new homes – but we wish to ensure that the best design possible is secured which considers local needs and sustainable development. The information provided by the Applicant both prior to the Plans Panel (April 2022) and since is inadequate. There is still work to do and Redrow as a national house builder can do better. We ask only that they adhere to their own Redrow 8 Principles and involve local people. We wish to stress the lack of public consultation to date; rather than include residents, they have been absent - which is reflected in the design. Residents have received no development update and the last leaflet was received in 2021. There is no bespoke website nor have we had any public consultation events in village halls. Yet this has occurred elsewhere in England at the same time this application has taken place. The site is strategically significant given its size and is one of Redrow's 'super six' sites in Yorkshire.

We have been surprised at the decision to return the application to this Plans Panel rather than at a later date which would have allowed notable revisions to be made and additional information to be submitted. The result is that there are many issues still to be clarified and key missing documents. This includes a Statement of Community Involvement, Planning Statement and Housing Needs Assessment (which takes account of the needs of the locality at the time of development). In terms of the latter, we have raised serious concerns about the Housing Mix Assessment (Johnson Mowatt, February 2022) submitted by the Applicant in terms of its approach and contents in the WAAG objection (March 2022) and also through emails to the Chief Planning Officer requesting the source of local needs. Our concerns have not been reflected in either of the Chief Planning Officer's reports to the Plans Panel. We maintain that there are legitimate issues regarding whether the application can be registered and have addressed this in more detail under Point 7 (Annex 1).

In 2019, Leeds City Council declared a Climate Change Emergency. The Council aims to provide high quality parks and green spaces in all local communities, for neighbourhoods where walking and cycling are the choice rather than cars and to plant hundreds of hectares of new trees to support the White Rose Forest initiative and the UK Government's commitments. Future generations - including existing and new residents will not thank us for failing to do the maximum now rather than leaving to them to rectify our mistakes. Addressing climate change is one of the core land use planning principles of national policy. How is this demonstrated by the proposals for the new occupiers of Plot 1 in Parcel D and their neighbours along Haigh Moor Road and Rosedale Drive as an example? Can it be better reflected in the design of scale, layout, landscaping and appearance which is what your decision is based on? We believe it can.

You can make the most difference at key points in the planning process such as this. Redrow's design clearly does not comply with important planning policies at a national and local level, nor with Supplementary Planning Documents or design guidance. A design which looks back to a previous decade rather than forward.

**The new information provided by the Applicant does not meet any of the Panel's eight resolution requirements.** We therefore request that you defer until the required information, clarity and details have been received. A matter of a few months delay to allow proper consultation to take place through a Community Forum would result in benefits for future generations – including new residents who would make the village their home.

Yours sincerely,

**Mr Peter Cowling (Chairman)**

cc. Mr Mark Jackson, Leeds City Council, Chief Planning Officer (via email)  
South and West Plans Panel Members (via email)  
Mr David Faraday, Redrow (via email)

## Annex 1: Points of Resolution 1 to 8

### Point 1 - Consideration of the provision of four and five bedroom homes for affordable housing

Members questioned whether affordable 4+bedroom homes could be provided as part of the Haigh Wood development.

The application involves up to 289 dwellings. Based upon the Applicant's Revised Accommodation Schedule (Dwg Ref: LWA-16-02-01F Master Mix), of the total number, 120 dwellings are 4+bedroom homes which equates to c.42% and is slightly higher than before.

No affordable 4+bedroom homes will be provided by the Applicant following their review.

Approximately 65% of the housing stock will be detached homes, however, no 3+bedroom detached dwellings will be affordable. Instead, it will consist mainly of 1 Bedroom Apartments, 2 Bedroom Terraced and 3 Bedroom Terraced. With regards to Policy H5 Affordable Housing Core Strategy (Adopted 2014 and Selective Review 2019), the site is in Zone 2 and offers the minimum affordable homes required. However, this is not a pro-rata mix in terms of sizes and house types of the total housing provision. The Housing Mix Assessment (February 2022) states that '*... need takes a precedent over aspirations when considering affordable housing provision*' (paragraphs 2.21 to 2.23).

We do not have access to the comments by the Plans Policy section of the Planning Department nor current affordable housing waiting lists for the area.

The Proposed Affordable Housing Plan (Drawing No. LWA-16-02-05, Rev B dated 28/04/22) does not show any change to the location of affordable homes. Generally, they are situated on the edge of Parcel boundaries and in terms of the number of dwellings per Parcel, are mainly in Parcels B and C which are the smallest, the furthest away from any key areas of green space and not connected by any public footpaths. We do not agree that they are suitably integrated throughout the site as stated in the Housing Mix Assessment (February 2022).

**The new information provided by the Applicant does not meet the resolution requirement. WAAG requests that the affordable homes should be better integrated into the design. We also ask the Applicant to review whether any 3 bedroom detached homes could be made affordable.**

### Point 2 - Consideration of the provision of bungalows

The Chief Planning Officer's report (May 2022) states that providing 4no. 2 bedroomed bungalows is in line with the Housing Mix Assessment (February 2022) and the issues highlighted by Members. Accordingly, it is compliant with Policy H4 Housing Mix of the Core Strategy (Adopted 2014 and Selective Review 2019).

We welcome that the revised housing mix includes bungalows which will be located in Parcel A (Plots 170 to 173) to reflect the sensitivity of the site boundary and nearby residential development at Upper Green Avenue. These are preferable to the 2 storey houses originally intended. However, new information provided by the Applicant is not clear about the appearance and scale of the bungalows. The West Ardsley Placemaking sheet refers to the bungalows and Parcel A's sensitive edge and shows an image of a bungalow and a large garage. Yet the layout seems to show 2no. detached bungalows with garages of different sizes and 2no. semi-detached bungalows with on street parking.

We are disappointed with the small number of proposed bungalows, particularly given the complexity of the site and that it has a number of sensitive boundaries for example near Woollin Avenue. At outline stage, parameter plans drew attention to this fact.

The aforementioned Housing Mix Assessment (February 2022) refers to the Strategic Housing Market Assessment (SHMA) (2017) and bungalows. At the time the SHMA was published, there was a lack of bungalows of different sizes ranging from 1 to 3 bedrooms in this sub-area.

Taking into account the proposed 289 dwellings, only 1.39% will be bungalows.

**The new information provided by the Applicant does not meet the resolution requirement. We request that further consideration is given to sensitive site edges and inclusion of more bungalows than proposed.**

### **Point 3 - Further information on trees including a full tree survey to include the quality of trees and detail regarding carbon capture**

The Applicant has submitted updated Arboricultural Impact Assessment Plans 1 to 4 (Smeeden Foreman) (Rev C, dated 6 May 2022) setting out trees and hedgerows to be retained or removed. We are pleased to learn that one of the three trees referred to by Members will now be retained (T66-C2).

The trees are not at the actual entrance point to the Haigh Wood development permitted as part of the outline consent (17/08262/OT) but are on the primary access route through Parcel A which would normally be looked at more closely at this detailed stage. There have been no options made public regarding different development layouts. The individual tree in question T68-A2 which will be removed is noted for its high quality and has an estimated remaining life expectancy of at least 40 years. It has cultural values, including conservation (BS 5837:2012). It is not possible to identify its species etc. or gain a better understanding based on the supplied information. The Plans refer to an Arboricultural Survey report, however, this is not included with the planning application nor is it available under planning reference 21/09529/COND. The Applicant's cover letter for the discharge of a number of conditions refers to an Arboricultural Survey Report (Rev D).

To be compliant with BS 5837:2012 Trees in relation to design, demolition and construction, a schedule of individual trees, groups and woodland as well as hedgerows should be included in a report. The schedules provide the sequential reference number (recorded on the tree survey plan) and key details about each tree or group such as species, height, canopy, estimated remaining contribution in years (<10, 10+, 20+, 40+) and the category U or A to C grading etc. It is also important to appreciate whether the surveyed trees have arboricultural qualities, landscape qualities or cultural values, including conservation.

The last Arboricultural Survey was undertaken at outline stage (17/08262/OT) in November 2017 (JCA Ltd.) and a direct comparison cannot be made given the different tree survey coding and changes to the proposed layout which have taken place in the interim period.

We do not agree with the view of the Chief Planning Officer that significant details have been submitted by the Applicant regarding the impact of the development.

**The new information provided by the Applicant does not meet the resolution requirement. An Arboricultural Survey report needs to be provided by the Applicant in accordance with BS 5837:2012. Further information is required regarding the number and quality of trees and hedgerows which will be retained or removed. No tree survey has been provided by LCC Tree Officers in the interim period as raised by Members. Nor has information been provided which sets out what will be planted as replacement numbers for the loss of trees etc. and the estimated carbon capture enhancement.**

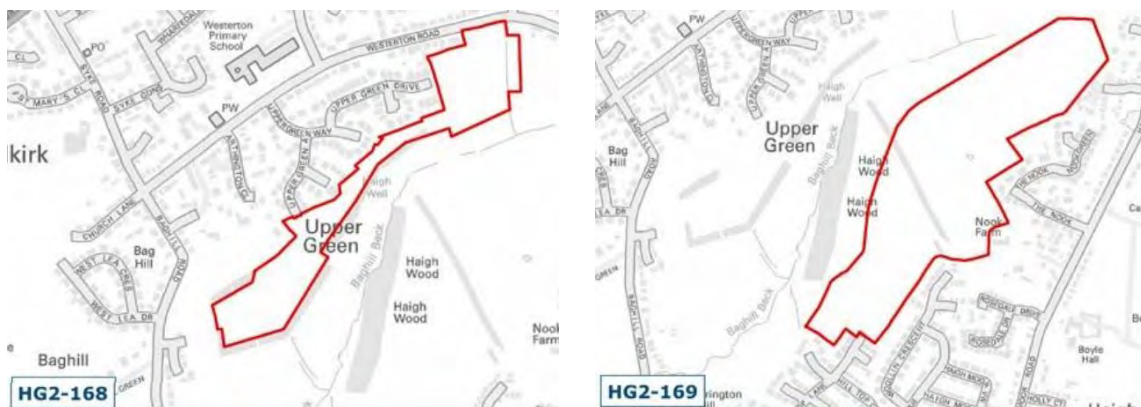
#### Point 4 - Further information on compliance with street design guidance

Members raised issues regarding design compliance with the adopted Street Design Guide SPD (August 2009). The purpose of the SPD is to promote innovative designs that are appropriate for the context, character and location of a site. Also relevant to this planning application is Neighbourhoods for Living (2015).

As an example, we have reviewed Parcel A and issues with the layout regarding Street Design Guide SPD (August 2009). Figure 1 - Analysis of the Haigh Wood Development to LCC Design Guidance provides an analysis of each Parcel with respect to the guidance mentioned above.

#### Parcel A

In the adopted Site Allocations Plan (SAP) (July 2019), the site forms part of the larger allocated sites HG2-168 and HG2-169 shown below (extracts taken from SAP Section 3).



SAP allocated site HG2-168 includes the area which now separates Parcels A and B and would have enabled two linked accesses on to Westerton Road. This loop would have reduced the lengths of cul-de-sacs in the existing Upper Green residential area and for the proposed houses in Parcel A. It would also have allowed vehicles to avoid the severe congestion at the junction of Upper Green Way and Westerton Road due to a nearby primary school. These issues have been raised by WAAG and residents in their objections. Without this connection, Parcel A will have cul-de-sacs more than double the maximum SPD length and will force traffic from the 54 proposed houses to use the Upper Green Way/Westerton Road junction thereby, worsening the severe congestion around the main school entrance. The Chief Planning Officer's report does not explain how Parcel A is compliant with the SPD in light of the excessive length of the cul-de-sacs (paragraph 30). Safety assurances in the same report are not supported by the traffic issues we have set out (paragraph 34).

The Street Design Guide SPD (August 2009) states that in order to create good places it is essential that highways and transportation matters are considered at the same time as other aspects of the design. To date, there is little evidence this has taken place.

It should be noted that despite assertions in the Design & Access Statement (Randal Thorp, August 2021) there is no permitted layout for the proposals under the existing consent (17/08262/OT). Rather it allows access to the site and does not set the internal layout of roads and houses within it. Whether allotted through the SAP or not, it is the Applicant's responsibility to demonstrate how the design is compliant with policy and guidance.

On the subject of the SAP, the Chief Planning Officer's report does not set out the estimated number of houses on the remaining land should these come forward for housing development at a future date as requested by Members.

**WAAG is convinced that the proposals do not conform with the SPD and no information has been provided by the Applicant to explain how they do. Nor have the LCC Design or Highways teams provided any new feedback on the proposals in light of the requests from the Panel. The new information provided by the Applicant does not meet the resolution requirement.**

**Figure 1 - Analysis of the Haigh Wood Development to LCC Design Guidance**

**Parcel A**

**Street Design Guide SPD (2009)**

- ★ Street layout should meet the needs of all users and not allow vehicles to dictate: Access is only gained from Upper Green Avenue and in turn, from the single point of access onto Westerton Road. The number of additional houses using the junction with Westerton Road which is opposite Westerton Primary Academy raises serious traffic concerns. The proposed layout of Parcel A is dominated by a primary road and secondary access.
- ★ Linked streets are encouraged to allow greater connectivity and accessibility by foot, for wheelchair users and by cycle and to avoid layouts purely based on cul-de-sacs: The first houses in Parcel A (plots 165/166) are contrary to the Street Design Guide SPD (2009) and its specified 200m maximum length of a cul-de-sac.

**Neighbourhoods for Living (2015)**

- ★ The site should be related to its neighbourhood: The 4no. bungalows are welcome given the sensitive boundary of the site. Less than 2% of the housing mix will be bungalows.
- ★ Connect new development into existing streets and footpaths: See bullet 1 - Street Design Guide SPD (2009).
- ★ Use the building form and enclosure to create spaces with a sense of local identity: The focus is the road layout and number of houses. The Parcel includes two small areas of Public Open Space (POS) near Upper Green Close and Upper Green Avenue which are close to pedestrian entry points. Other areas on the southern boundary are not defined.
- ★ Ensure that massing and height of buildings respect what would be overlooked and overshadowed: Proposed houses at the eastern end of Parcel A are in close proximity to Haigh Wood, its buffer zone and adjacent existing housing on Upper Green Way/Drive and Close.

**Parcel B**

**Street Design Guide SPD (2009)**

- ★ The design should create quality environments in which to live, work and play: Much of the green space in the northern part of this Parcel is necessary to account for access from Westerton Road (i.e. due to sightlines). A small area of POS consists of an attenuation pond with scattered trees and amenity grassland. The area is not widely overlooked by nearby properties.

**Neighbourhoods for Living (2015)**

- ★ Access to natural spaces is a major influence on health and wellbeing: There is no direct access for pedestrians to Haigh Wood, the central valley or main children's play area.
- ★ Provide adequate outdoor private spaces: Immediately adjacent (east) is an area which is included in the blue line on the approved plan Drawing No.1706.02 (Rev A) Location Plan (STEN Architecture, Dated 11.08.17) under outline consent 17/08262/OT. Many properties in Parcel B consist of affordable homes without their own private gardens. This area would be ideal to use for as allotments given that there is a broader lack of local facilities and/or a community orchard/woodland.

**Parcel C**

**Street Design Guide SPD (2009)**

- ★ Street layout should meet the needs of all users and not allow vehicles to dictate: The layout of Parcel C is dictated by the access road rather than housing and green space.

**Neighbourhoods for Living (2015)**

- ★ Access to natural spaces is a major influence on health and wellbeing: A small area of POS (c.0.05Ha). Again is drainage led rather than purpose or activity driven. It consists of an underground attenuation tank and grassland. There is no direct access for pedestrians to Haigh Wood, the central valley or main children's play area.

**Parcel D**

**Neighbourhoods for Living (2015)**

- ★ Access to natural spaces is a major influence on health and wellbeing: Consists of two green corridors associated with designated footpaths. Both are divided into two parts by the proposed primary access road. Green corridors are categorised as amenity green space rather than natural green space by LCC. The width of both green corridors is generally c.23m along the footpath routes. They mainly consist of proposed grassland (amenity/wild flower) and individual trees (where space allows).
- ★ Children and young people need to have the space and freedom to play, socialise and have fun: Activities in the site are primarily concentrated in the larger green corridor, e.g. existing footpaths and woodland, a proposed community orchard, trim trail and mounds. The main purpose of this green corridor – that of enhancing the footpath route, is in danger of being at odds with other uses. As footpaths will be used by dog walkers and there is no demarcation between amenity grassland and play areas used by children.
- ★ Landscape proposals should be a key aspect of the scheme to integrate buildings and spaces within the wider context: There are few street trees either in Parcel A or D which add to their character and will assist in assimilating the new built form into its surroundings. Both Parcels include notable blocks of housing which generally consist of 4+ bedroom houses.
- ★ Ensure that massing and height of buildings respect what would be overlooked and overshadowed: Sensitive boundaries with existing residential properties e.g. on Woollin Avenue could incorporate bungalows.
- ★ Ensure scale and massing is designed to complement the context and character of the area: The development is dominated by 4+ bedroom dwellings.
- ★ Ensure the scale and massing respects the scale of adjacent forms (buildings or open space and views) and the topography: Saved UDP Policy N11 Open Land in Built Up Areas of the Leeds Unitary Development Plan (UDP) (Review 2006) seeks to protect large tracts of open land from development due to their importance for public amenity. There is a lack of an integrated landscape strategy for both sensitive open areas of green space and residential properties.

**General Comments – Green Space and Haigh Wood**

**Street Design Guide SPD (2009)**

- ★ The layout should create an environment that is safe for all street users and in which people are encouraged to walk, cycle and use public transport: The improvements to the footpath network primarily relate to the upgrading of existing definitive routes. No footpaths either existing or new are suitable for cyclists. The increased overall length of the footpath network is minimal plus there is a lack of connection for Parcels B and C.

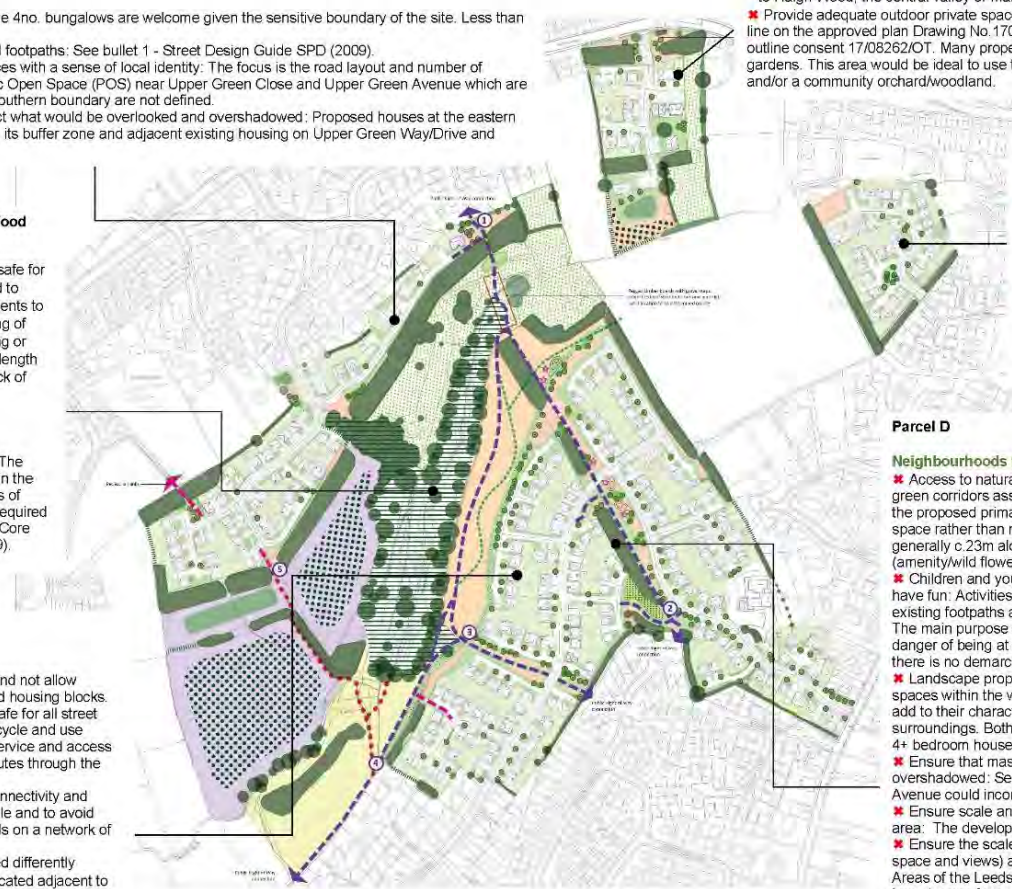
**Neighbourhoods for Living (2015)**

- ★ The site should be related to its neighbourhood: The Applicant has not considered existing green space in the Ardsley & Robin Hood/Morley South Wards in terms of deficits and surpluses or quality standards. This is required to be compliant with key Policies G3 and G4 of the Core Strategy (Adopted 2014 and Selective Review 2019).

**Parcel D**

**Street Design Guide SPD (2009)**

- ★ Street layout should meet the needs of all users and not allow vehicles to dictate: Layout is dominated by roads and housing blocks.
- ★ The layout should create an environment that is safe for all street users and in which people are encouraged to walk, cycle and use public transport: Lack of connection to regular bus service and access via footpaths to bus stops in the vicinity. No cycle routes through the site.
- ★ Linked streets are encouraged to allow greater connectivity and accessibility by foot, for wheelchair users and by cycle and to avoid layouts purely based on cul-de-sacs: Design depends on a network of cul-de-sacs and long primary roads.
- ★ Any particular street type may need to be designed differently adjacent to play areas: The children's play area is located adjacent to the road network.
- ★ Landscape provision should be integral to its conceptual and detailed design and be consistent with the wider development and the surrounding landscape context: Lack of landscape strategy for this large Parcel. Homogeneous repetition of roads and houses.
- ★ Developments set back from the bus route must be linked to it by footpaths that are direct, well surfaced and well lit. See bullet 2.





## Point 5 - More detail on placemaking

Placemaking is a key part of good design and dependent on the site can encompass historic character, the environment, public footpaths and other aspects of local distinctiveness.

The West Ardsley Placemaking sheet provided by the Applicant includes very little information with regards to the essential aspects of placemaking and how these have evolved. Furthermore, the images provided do not make it clear whether they are showing how the development will look rather than if they are included for illustrative purposes. Residents have not had the opportunity to see photomontage images or cross sections showing changes to views or indicating the mass and arrangement of built form.

Elsewhere in the application, the Design & Access Statement (August 2021) refers to Redrow's placemaking principles but does not set out how they apply to the proposals. Nor does it explain how the National Design Guide (January 2021) and other guidance do either. Whilst the Sustainability Design Principles (February 2022) concentrates on footpaths, providing interpretation boards as well as generic aspects such as the potential to install water butts.

Leeds City Council are currently holding a consultation this month regarding the 20-minute neighbourhood concept as part of placemaking. Features of a 20-minute neighbourhood include diverse and affordable homes, well connected paths, streets and spaces, schools, good green spaces in the right places, local food production, local jobs, community health and wellbeing and a place for all ages.

At a site level important placemaking components can include reducing pollution, SuDs measures, energy efficiency, biodiversity, safe footpath links to surrounding neighbourhoods, community gardens, solar gain as well as tree planting for urban cooling and carbon capture.

Based on the evidence to date, the Applicant has missed multiple opportunities to contribute to placemaking and reinforce local distinctiveness.

Despite the site being so large, it does not contain specific character areas or even apply a different strategy for tree planting along primary and secondary roads.

Taking Parcel D as an example, this will contain the largest amount of houses. The West Ardsley Placemaking sheet refers to a '*Low density character area comprised of primarily larger detached homes facing outwards over the open space. A naturalistic landscape character is proposed, influenced by Haigh Wood*'. The density of the housing looks little different from elsewhere in the site. As we have stated c.42% of new homes will be 4+bedrooms. Reference to the Proposed Boundary Treatment Plan (Rev B, 28/04/22) shows a secondary access road and metal estate railings. The Applicant has looked again at this sensitive edge and instead of amenity grassland there will be a strip of wildflower grassland (c.6m wide) as shown on the Landscape Strategy (Smeeden Foreman, Drawing No.LS01 Rev C: Dated: 06 05 22). The individual trees will be included 'where space allows' according to the Drawing. Yet this western boundary is key and we are left with no notable transitional zone between the open valley areas and built form. Currently, there is an emphasis on views from proposed dwellings rather than landscape proposals which will achieve a gradual transition. This approach is disappointing particularly in light of important Saved Policies from the Leeds Unitary Development Plan (UDP) (Review 2006) which are relevant to the landscape treatment of the sensitive edges of the Haigh Wood development (Saved UDP Policies N11, N24, N25 and LD1) and Supplementary Guidance.

In terms of green space provision, Parcel D is very dependent on two green corridors which not only facilitate the footpaths but concentrate too many activities in one place. At the moment, the emphasis is on the layout of the primary and secondary access roads and built form; there are few street trees throughout the site and a frequency of smaller areas of Public Open Space to be located on the edge of the housing Parcels. It is advisable for green space as part of housing developments to be well located so that it is surrounded and well overlooked by the housing that it serves.

As a sensitive site which encompasses Haigh Wood, which is a Local Wildlife Site and Ancient Woodland, it is essential that a site-wide landscape strategy is designed which can alleviate pressure on this area and enhance biodiversity. This would also help placemaking at the site.

The approach of both the outline and detailed planning applications has been to treat key green space Policies G3 and G4 of the Core Strategy (Adopted 2014 and Selective Review 2019) in an overly simplistic way. Both failed to consider deficits/surpluses and the existing green space in the area in terms of quality and quantity. Instead, they have focused on the amount of green space per dwelling required rather than what exists in the vicinity.

It has been highlighted to Redrow that there is a shortage of allotment places in relevant Wards and given that the proposed apartments in Parcel B will not have their own private gardens. Locating a community garden/allotment to the east of Parcel B would be an ideal solution and help forge community cohesion. Much more could be accomplished here than including a small orchard and foraging in one of the green corridors in Parcel D.

We are pleased that additional information has been provided about renewable energy at the site. In regards to electric charging points, we would also suggest that bus passes for new residents would encourage the use of public transport in the area.

**The information provided by the Applicant does not convey the essential local distinctiveness of the site and wider area. A key part of good placemaking is involving the local community. The new information provided by the Applicant does not meet the resolution requirement.**

## **Point 6 - More clarity on cycle segregation and the footpath network**

The Chief Planning Officer's report addresses matters relevant to Public Rights of Way (PRoW) and cycle routes (paragraphs 37 to 39).

WAAG agrees that there should be no encouragement of cycling within Haigh Wood itself which we have always cautioned against given its ecological sensitivity as a Local Wildlife Site and Ancient Woodland. We welcome that the Landscape Strategy (Rev C) (May 2022) indicates a pedestrian path which will use the current track between Parcel A and Baghill Road. This could also be used by cyclists if this can be facilitated in accordance with design guidance, given that there is a danger of motor cycles or illegal e-scooters also being used.

The Design & Access Statement (August 2021) professes that one of the key potential benefits of the Haigh Wood development is that new pedestrian and cycle links will improve connections through the site and also to surrounding areas. However, the reality is somewhat different. Furthermore, the changes made by the Applicant have not addressed the key faults of the design as it stands both with regards to public footpaths and cycling routes which include the following.

- We do not agree with the Chief Planning Officer's report which states that the improvements to PRoW will 'immeasurably' improve the pedestrian connectivity of the site as a whole (paragraph 37). Currently, there are c.2100m footpaths provided (both definitive and non-definitive). The increased overall length is minimal plus there is a lack of connection for Parcels B and C. None of the routes, either the existing ones which will be upgraded or new routes are suitable for cyclists.
- One of the key aspects at this stage is how the Applicant solves issues such as links with footpaths and cycle routes as the design progresses. The emphasis on the 20mph speed limit by the Chief Planning Officer is misleading due to the lack of connection between the different land Parcels and with the wider area for cyclists. There is little opportunity to ride around the individual land Parcels apart from Parcel D.
- Footpath routes Morley 81 and 107 will be more fragmented due to the primary road which runs through Parcel D.

- In terms of sustainable transport and to reduce the number of local journeys depending on cars, it is of paramount importance to make the development more sustainable and present realistic options for alternative travel modes such as walking and cycling.

**The new information provided by the Applicant does not meet the resolution requirement. There is a lack of connectivity between individual land Parcels and the surrounding area which limits sustainable travel options. Improvements to public footpaths are minimal and no cycle routes have been provided.**

### **Point 7 - Invitation of a policy officer to discuss Policy H4 and the housing mix**

We have set out our own concerns below regarding Policy H4 Housing Mix of the Core Strategy (Adopted 2014 and Selective Review 2019).

Condition 7 of outline consent 17/08262/OT (October 2020) states *'The details submitted pursuant to condition 2 above shall demonstrate how the development shall comply with policy H4 of the adopted Core Strategy with regard to achieving an appropriate housing mix'*. The reason given is *'To provide a sustainable form of development that meets the requirements of Policy H4 of the Core Strategy'*.

The Core Strategy notes in relation to Policy H4, housing development and associated growth principles, that it is vital for LCC to ensure that housing growth targets reflect local housing needs now and in the future, in terms of tenure, type and size. Spatial Policy 6 highlights the importance of reinforcing the local distinctiveness of existing neighbourhoods through the design and standard of new homes, whilst having the most positive impacts on green infrastructure and mitigating flood risks.

Policy H4 states that *'developers should submit a Housing Needs Assessment addressing all tenures so that the **needs of the locality can be taken into account at the time of development'***. (our bold text)

When deciding on an appropriate mix for new housing, Applicants must consider both current and future local needs. The most recent version of the Strategic Housing Market Assessment (SHMA) was published by LCC in 2017 and is now approximately five years old.

As set out in the WAAG objection (March 2022), in the absence of the required assessment which addresses local needs, we maintain that this application is invalid. As stated previously, we are disappointed that our concerns have not been reflected in the Chief Planning Officer's reports. A WAAG member has contacted the Chief Planning Officer by email to ascertain where local needs are accounted for. No response has been received from the Chief Planning Officer, other than to confirm what he has subsequently included in his report, that he is satisfied with the information submitted by the Applicant.

We have provided a review of the evidence cited by the Housing Mix Assessment (February 2022) in the WAAG objection (March 2022). The former also criticises the lack of an updated SHMA (paragraph 2.6). The only up to date information about this locality which has been provided is an analysis of existing provision and not of current need. This has been repeatedly ignored by the Chief Planning Officer.

During the last decade, LCC has had increasing concerns about the approach by developers to Policy H4 which has led to a propensity for 4+bedroom houses particularly, in outer areas. This can have a serious effect on the design of individual sites when considering scale and mass of new built form – which is the case here. Currently, of the 289 dwellings proposed, approximately 42% are 4+bedroom houses (120 dwellings).

At the time, when considering the site under outline consent 17/08262/OT, the Chief Planning Officer's Report (21 May 2020) refers to a density of approximately 23 dwellings per hectare rather than 30 dwellings being appropriate for the site. This was due to the surrounding residential properties and compliance with the Core Strategy as it reflects the wider rural area. However, the Design & Access Statement (August 2021) refers to a layout based on approximately 30 dwellings (net of built infrastructure and green space) rather than the lower 23 dwellings per hectare. It is not clear what has altered since the Chief Planning Officer's Report which makes this higher density now acceptable.

Paragraph 92 of the most recent Chief Planning Officer's Report now states that the density of development (net development only) is 34.6 dwellings per hectare which is actually higher than the guidance of Policy H3 Density of Residential Development in the Core Strategy. Given the absence of any Planning Statement it is not possible to understand how and why it complies with local context and character as asserted by the Chief Planning Officer. Policy H3 and (iv) Smaller Settlements states that 30 dwellings per hectare applies *'unless there are overriding reasons concerning townscape, character, design or highway capacity'*.

Two recent reports to LCC committees by the Chief Planning Officer and Head of Governance and Scrutiny Support & Director of City Development draw attention to problems with housing mix and Policy H4, in particular, the issue of 4+bedroom houses and the SHMA. Further details can be found in the WAAG objection (March 2022). There is clearly an acceptance by LCC that there is an unwelcome weighting towards 4+bedroom houses such as in outer areas which applies to the site. The evidence provided in the Housing Mix Assessment (February 2022) does not explain why their divergence from the target mix is justified. Moreover, much of the evidence presented predates the LCC reports to more recent planning committees. Adopting the approach by the Applicant will only add to LCC's own concerns about the housing mix which clearly exist.

A change to the housing mix has occurred before regarding other sites and has been negotiated between LCC and Redrow. At the site, this would provide opportunities for different housing types such as bungalows and an overall scheme that is not dominated by 4+bedroom dwellings. In turn this could have real benefits such as addressing the sensitive site edges including the height of proposed housing and where they overlook adjacent existing properties. It would deliver additional affordable dwellings for new residents as well – currently, no detached 3+bedroom dwellings are affordable. A revised layout would facilitate the better arrangement of proposed green space both for residents and the protection of Haigh Wood. Furthermore, it would lend itself to a smaller scale development which would be more appropriate given its location within a village and satisfy local housing needs.

**The new information provided by the Applicant does not meet the resolution requirement. We request the evidence of an up to date analysis of local needs.**

## **Point 8 - Further consultation with Ward Councillors**

WAAG and a small group of residents met with Redrow at the Hill Top Community Centre on 27 January 2022. At which, Redrow stated that in addition to WAAG, that Local Councillors would be consulted on the proposals.

At the Plans Panel (April 2022), Members raised concerns about the lack of consultation with Local Councillors and requested that proper consultation with them should be held before the application returned to the Plans Panel. Ardsley and Robin Hood together with Morley South are the relevant Wards rather than Morley North as stated in the Chief Planning Officer's report (paragraph 8).

Local Councillors provide a link between the community and LCC. Further to whether they have been notified about LCC receiving additional information from the Applicant, we have much wider concerns that Local Councillors have not been fully consulted during the design process.

National Planning Practice Guidance (NPPG) supports the National Planning Policy Framework (July 2021). Design: process and tools NPPG (October 2019) stresses the importance of community forums in supporting dialogue between project teams and the wider community (paragraph 22).

LCC's own Statement of Community Involvement (Adopted February 2007) sets out the responsibility of both the Council and Applicants in relation to community consultation. It states that the Council will seek greater community involvement for major applications or applications of community significance (paragraph 5.7). Whilst *'insufficient community involvement by the applicant will be reported to the Plans Panel who may wish to seek the views of the community on a material planning matter before making a decision'* (paragraph 5.14).

We have set out the vast difference between how Redrow has approached this application and others in England during the later stages of Covid-19 in the WAAG objection (March 2022).

**The new information provided by the Applicant does not meet the resolution requirement. We request that a Community Forum with Redrow, Local Councillors and residents should be formed as part of a design review to help solve the issues with the development which clearly exist.**